

Exhibit 11

Exhibit 12

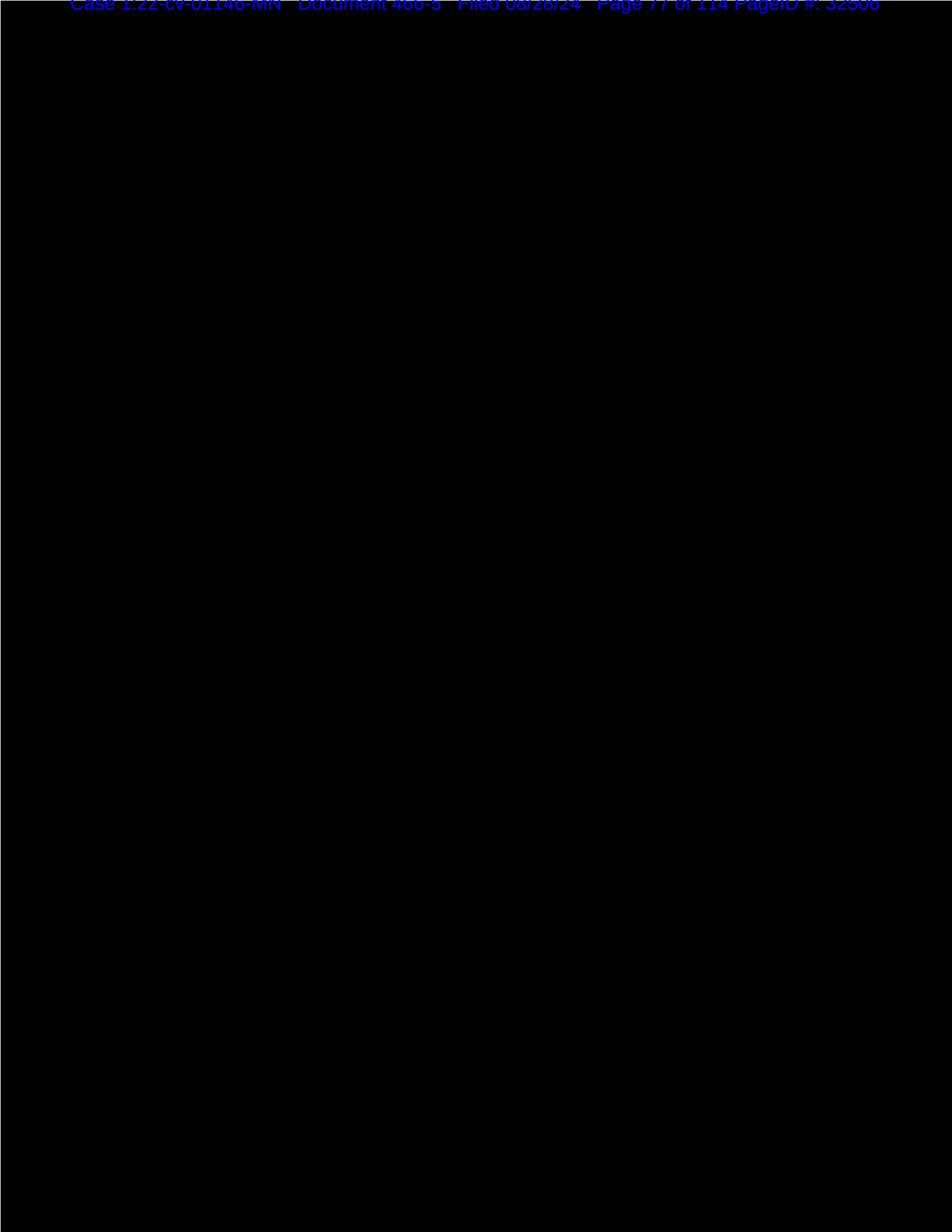


Exhibit 13

Message

From: Richard Grisenthwaite [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3364EA3E687548A19F8FE5BD997B99EC-RICHARD GRI]
Sent: 03/02/2022 10:21:52
To: Vivek Agrawal [Vivek.Agrawal@arm.com]; Martin Weidmann [Martin.Weidmann@arm.com]; John Horley [John.Horley@arm.com]; Michael Williams (ATG) [Michael.Williams@arm.com]
CC: Nizamudheen Ahmed [Nizamudheen.Ahmed@arm.com]; Aparajita Bhattacharya [Aparajita.Bhattacharya@arm.com]; Anand Muthuraman [Anand.Muthuraman@arm.com]
Subject: RE: Nuvia [REDACTED] (v8.7) implementation results/waivers summary for compliance sign-off "green signal"

Hi,

Thanks

Richard G

Vivek Agrawal wrote on 2022-02-03

> Hi Richard, Mike, Martin and John

>

>

>

> Qualcomm (Nuvia) have shared the results for their v8.7

> implementations called [REDACTED]

>

[REDACTED] will follow

> soon (ETA end-March), They will do fresh sign-off for [REDACTED]

> [REDACTED] after fixing issues.

>

>

>

> Below is the [REDACTED] The

> attachment contains [REDACTED] details.

>

> I am requesting an offline review for your approval. Let me know if

> you find it appropriate for sign-off green signal to partner.

>

>

> Implementation summary:

>

>

>

>

>

>

>

>

>

>

>

> 7

> 7

> 7

[illegible]

[illegible]


```
> <br></pre>
<p><b>others:</b></p>
<p><b>=====</b></p>
<p><b>1.</b> The current implementation indicated their [REDACTED]<br>field value as [REDACTED] which was assigned to Nuvia.<br><b>We expected it to be changed to Qualcomm (after takeover), [REDACTED]<br>[REDACTED] Already aligned with Martin.</b></p>
```

> Regards ,
>
> Vivek

Richard Grisenthwaite
Arm Ltd
110 Fulbourn Road

Exhibit 14

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ARM LTD., a U.K. corporation,
Plaintiff,

v.
QUALCOMM INC., a Delaware corporation,
QUALCOMM TECHNOLOGIES, INC., a
Delaware corporation, and NUVIA, INC., a
Delaware corporation,
Defendants.

C.A. No. 22-1146-MN

**CONTAINS HIGHLY
CONFIDENTIAL – ATTORNEYS’
EYES ONLY INFORMATION**

**ARM LTD.’S OBJECTIONS AND RESPONSES TO
QUALCOMM’S THIRD SET OF INTERROGATORIES (NO. 20)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Local Civil Rules of this Court (“Local Rules”), Arm Ltd. (“Arm”) submits the following responses and objections to Qualcomm’s Third Set of Interrogatories (No. 20), served October 10, 2023, (“Interrogatories”).

RESERVATION OF RIGHTS

1. Arm’s responses to the Interrogatories (“Responses”) are made in accordance with the Federal Rules of Civil Procedure and based upon information currently available to Arm. Investigation and discovery are ongoing in this case. Arm responds to the Interrogatories without prejudice to Arm’s right to supplement its Responses. Arm provides these responses and objections to the best of its current knowledge, information, and belief, based on information readily and reasonably available to it after making a reasonable inquiry. Arm expressly reserves the right to modify or supplement any Response and to assert additional objections to the Interrogatories as necessary or appropriate.

2. Arm makes these responses subject to and without waiving Arm's right to introduce, use, or refer to information, which Arm presently has, but which Arm has not yet had sufficient time to analyze and evaluate, as well as Arm's right to amend or supplement its responses in the event that any information previously available to Arm is unintentionally omitted from its responses.

3. Arm objects to each instruction, definition, and/or Interrogatory to the extent that it seeks information, documents, and/or things protected from disclosure by the attorney-client privilege, the attorney work-product doctrine, common interest privilege, joint defense privilege, or any other applicable privilege or protection, and will not disclose such material.

4. To the extent a Response herein identifies one or more individuals with knowledge concerning a particular subject matter identified in an Interrogatory, such Response shall not be construed as an admission concerning the accuracy of Defendants' characterization of the subject matter.

GENERAL OBJECTIONS

Arm makes the following General Objections, pursuant to the Local Rules, which are hereby incorporated by reference in each Response to each Interrogatory. By responding to these Interrogatories, Arm does not intend, and shall not be deemed to have accepted or adopted any of Defendants' definitions or instructions. Arm incorporates by reference its General and Specific Objections set forth in *Arm Ltd.'s Objections and Responses to Qualcomm's First Set of Interrogatories (Nos. 1-11)*, served February 27, 2023 and *Arm Ltd.'s Objections and Responses to Qualcomm's Second Set of Interrogatories (Nos. 12-19)*, served October 2, 2023.

1. Arm objects to the definition of "Plaintiff," "ARM," "you," and "your" as overbroad to the extent it defines these terms beyond Arm Ltd.

2. Arm objects to the definitions of “ALA” as overbroad to the extent it defines Architecture License Agreement to include “all amendments and annexes to any such agreement.”

3. Arm objects to each instruction, definition, and Interrogatory to the extent that it seeks information, documents, or things protected from disclosure by the attorney-client privilege, the attorney work-product doctrine, common interest privilege, joint defense privilege, or any other applicable privilege or protection. No privileged or protected information will be disclosed. Any disclosure of protected or privileged information is inadvertent and is not intended to waive these privileges or protections.

4. Arm objects to each instruction, definition, and Interrogatory to the extent that it seeks to impose obligations on Arm beyond those required by the Federal Rules of Civil Procedure, the Local Rules, or any other applicable laws, rules, or orders.

5. Arm objects to the Interrogatories to the extent that they seek confidential, proprietary, or trade secret information pertaining to Arm, its business, or third parties that is subject to the Protective Order entered in this case.

6. Arm objects to the Interrogatories to the extent that they seek to obtain any information or documents that are not in its possession, custody, or control.

7. Arm objects to the Interrogatories to the extent that they seek information already in Defendants’ possession, information that is a matter of public record, or otherwise equally available to Defendants or equally obtainable from more convenient sources.

8. Arm objects to the definitions contained in the Interrogatories to the extent they attempt to define terms that may require construction by the Court.

SPECIFIC RESPONSES AND OBJECTIONS TO INTERROGATORIES

INTERROGATORY NO. 20:

Identify and describe in detail all [REDACTED]
[REDACTED] of the NUVIA ALA, including [REDACTED]
[REDACTED] of the NUVIA ALA (i.e., [REDACTED]
[REDACTED]. Your response should include a
specific identification of all documents and information (verbal, written, or in any other format)
You contend is [REDACTED] including by reference to Bates numbers and
through a detailed description of any and all verbal [REDACTED] and an
identification of the three (3) Persons by name, job title, and employer with the most knowledge
about what constitutes [REDACTED] under the NUVIA ALA.

RESPONSE TO INTERROGATORY NO. 20:

Subject to its objections, Arm incorporates by reference its objections and responses to
Defendants' Interrogatory No. 1.

Arm further responds as follows: As defined in the Nuvia ALA, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The Nuvia ALA identifies

[REDACTED]

[REDACTED] The definition of

[REDACTED]

[REDACTED]

Thus, Arm [REDACTED] includes the following general categories of
information:

1. [REDACTED]
[REDACTED]

[REDACTED]

2. [REDACTED]

[REDACTED]

3. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Arm responds with additional examples of [REDACTED] as follows.

The [REDACTED] core constitutes [REDACTED] at least as a [REDACTED]
[REDACTED], as well as [REDACTED] and SoCs that incorporate the [REDACTED] core, including
[REDACTED], as well as Oryon which Arm understands is the tradename for
the [REDACTED] core and related SoC's. The [REDACTED] second-generation core and [REDACTED]
third-generation core similarly constitute or will constitute [REDACTED]
because these cores are based on [REDACTED] Nuvia and Qualcomm source code, including
code produced by Nuvia and Qualcomm in this case for [REDACTED]
[REDACTED] constitute [REDACTED]. Other aspects of the
Qualcomm and Nuvia SoCs that may also constitute [REDACTED], include,
for example, the [REDACTED]

Deliverable items identified in the Nuvia-Arm ALA and ALA Annex constitute [REDACTED]
[REDACTED]. *See, e.g.*, ARM_00059183 (ALA), QCARM_0339310 (9/27/2019
ALA Annex 1), ARM_00057230 (3/27/2020 ALA Annex 1). Thus, the [REDACTED]

[REDACTED]

[REDACTED]

Information downloaded via Arm Connect, DropZone, or PDH in furtherance of the development of Nuvia-based products such as [REDACTED] and Oryon constitute [REDACTED]. *See* ARM_00002045, ARM_01309676, ARM_00026092, ARM_01240200, QCARM_0385296, QCARM_2422445, QCARM_2422671, QCARM_2423614, QCARM_2544937, QCARM_3835324.

Arm also provided support to Nuvia and Qualcomm's development of at least [REDACTED] [REDACTED]. The support constitutes [REDACTED], at least as an example of [REDACTED]. For example, Arm provided the following support services:

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
(*See* QCARM_0557840);
- [REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]; and

-

ARM_01265286-290, ARM_00039801, ARM_01020222-225, ARM_01265318-334,
ARM_01265360-374, ARM_01265410-412, ARM_01265415-417, ARM_01265424-428,
ARM_01265441-442, ARM_01265470-471, ARM_01265475-476, ARM_01265478-481,
ARM_01265505-507, ARM_01265509-511, ARM_01265540-542, ARM_0126554-546,
ARM_01265548-550, ARM_01265560-569, ARM_01265572-575, ARM_01265581-595,
ARM_01265606-610, ARM_01265613-617, ARM_01265619-621, ARM_01265629-630,
ARM_01265632-638, ARM_01265645-648, ARM_01265650-654, ARM_01265656-660,
ARM_01265662-665, ARM_01265667-670, ARM_01265672-675, ARM_01265685-688,
ARM_01265692-698, ARM_01265701-703, ARM_01265714-717, ARM_01265739-745,
ARM_01265758-762, ARM_01265765-770, ARM_01265773-777, ARM_01265780-784,
ARM_01265787-795, ARM_01265907-909, ARM_01265967-970, ARM_01283328-335,
ARM_01283339-362, ARM_01283373-378, ARM_01283559-561, ARM_01283570-571,
ARM_01283575-577, ARM_01283581-625, ARM_01283687-688, ARM_01283690-694,
ARM_01283738-754, ARM_01283769-772, ARM_01283774-782, ARM_01283784-792,
ARM_01283800-802, ARM_01283818-826, ARM_01283828-829, ARM_01283836-837,
ARM_01283849-851, ARM_01283857, ARM_01283862-863, ARM_01283869-872,
ARM_01283926-928, ARM_01283948-951, ARM_01283959-963, ARM_01283965-967,
ARM_01283968-974, ARM_01283975-986, ARM_01283989-997.

Arm further identifies the following documents that include [REDACTED]

[REDACTED], [REDACTED]
[REDACTED]: ARM_00116328-337, ARM_00089152-169, ARM_0008919-240, ARM_00099137-214, ARM_00099271-312, ARM_00099472-525, ARM_00099526-603, ARM_00099622-657, ARM_00099878-924, ARM_00100010-011, ARM_00089145-151, ARM_00089170-187, ARM_00099313-352, ARM_00099663-741, ARM_00099742-790, ARM_00099808-823, ARM_00099824-873, ARM_00099874-877, ARM_00099931-009, ARM_00099359-407, ARM_00099231-270, ARM_00089110-113.

Arm further identifies the following documents from Vivek Agrawal's custodial documents as constituting or discussing [REDACTED] sent to Nuvia or Qualcomm pursuant to the Nuvia ALA: ARM_00120623-ARM_01020227.

Arm further identifies all information or design work [REDACTED] by Qualcomm as constituting [REDACTED]. *See* Qualcomm's Responses and Objections to Arm's Interrogatory No. 5.

Arm further identifies the following exemplary Arm documents marked as confidential and produced by Qualcomm, which constitute [REDACTED]:

QCARM_3691945, QCARM_3691981, QCARM_3692028, QCARM_3693218, QCARM_3693477, QCARM_3693513, QCARM_3693543, QCARM_3693564, QCARM_3693619, QCARM_3693722, QCARM_3693776, QCARM_3693804, QCARM_3693829, QCARM_3693842, QCARM_3693857, QCARM_3693887, QCARM_3693899, QCARM_3693936, QCARM_3693950, QCARM_3693957, QCARM_3694220, QCARM_3694261, QCARM_3694346, QCARM_3694585, QCARM_3694633, QCARM_3695919, QCARM_3695958, QCARM_3695979,

QCARM_3695998, QCARM_3696013, QCARM_3696034, QCARM_3696062,
QCARM_3696089, QCARM_3696111, QCARM_3696144, QCARM_3696165,
QCARM_3696190, QCARM_3696212, QCARM_3696232, QCARM_3696257,
QCARM_3696277, QCARM_3696306, QCARM_3696322, QCARM_3696346,
QCARM_3696364, QCARM_3696391, QCARM_3696411, QCARM_3696428,
QCARM_3696452, QCARM_3696473, QCARM_3696494, QCARM_3696517,
QCARM_3696540, QCARM_3696561, QCARM_3696607, QCARM_3696688,
QCARM_3696699, QCARM_3697021, QCARM_3698133, QCARM_3698205,
QCARM_3702832, QCARM_3706205, QCARM_3706558, QCARM_3706622,
QCARM_3706958, QCARM_3707061, QCARM_3707072, QCARM_3707182,
QCARM_3707732, QCARM_3707779, QCARM_3707820, QCARM_3708163,
QCARM_3708805, QCARM_3708860, QCARM_3708972, QCARM_3709008,
QCARM_3709021, QCARM_3713248, QCARM_3713745, QCARM_3714716,
QCARM_3714927, QCARM_3715016, QCARM_3715077, QCARM_3715191,
QCARM_3715612, QCARM_3715643, QCARM_3715650, QCARM_3715689,
QCARM_3715740, QCARM_3715856, QCARM_3716159, QCARM_3716177,
QCARM_3716222, QCARM_3716294, QCARM_3716337, QCARM_3716414,
QCARM_3716469, QCARM_3716595, QCARM_3717137, QCARM_3717164,
QCARM_3717351, QCARM_3718427, QCARM_6258652, QCARM_6268470,
QCARM_6268578, QCARM_6276965, QCARM_6277038, QCARM_6277330,
QCARM_6277449, QCARM_6277645, QCARM_6277761, QCARM_6280003,
QCARM_6463691, QCARM_6473774, QCARM_6473948, QCARM_6474186,
QCARM_6475312, QCARM_6478004, QCARM_6480388, QCARM_6480692,

QCARM_6481599, QCARM_6481653, QCARM_6494508, QCARM_6499535, QCARM_6524054, QCARM_6526802, QCARM_6527386, QCARM_6527446, QCARM_6529183, QCARM_6533522, QCARM_6792955, QCARM_6793866, QCARM_6795527, QCARM_6797306, QCARM_6813134, QCARM_6813221, QCARM_6854316, QCARM_6855576, QCARM_6856860, QCARM_6856923, QCARM_6858048, QCARM_6896238, QCARM_6896620.

The Nuvia ALA and Annex 1 constitute [REDACTED], as well as the terms therein. The Nuvia TLA and Annexes 1 constitute [REDACTED], as well as the terms therein.

Arm identifies Richard Grisenthwaite, Vivek Agrawal, Christine Tran, and Jignesh Trivedi as individuals with knowledge of what constitutes [REDACTED].

Arm objects to this Interrogatory as overly broad, unduly burdensome, and disproportionate to the needs of the case insofar as it seeks a full accounting of all [REDACTED] [REDACTED] provided to Defendants, including all “verbal [REDACTED] [REDACTED]” Arm further objects to this Interrogatory as seeking information that is more readily available to Qualcomm than it is to Arm and that is not within Arm’s possession, custody or control. Arm likewise objects to this Interrogatory as premature in that it seeks Arm’s position regarding all “[REDACTED],” including with reference to BATES numbers when the full extent of Qualcomm’s possession of such information may not have yet been fully disclosed in discovery. Arm objects to this Interrogatory to the extent it seeks information protected from discovery by the attorney-client privilege, the attorney work-product doctrine, the common interest privilege, the joint defense privilege, or any other applicable

privilege or claim of confidentiality, or that is otherwise not discoverable under the Federal Rules of Civil Procedure or the Local Rules.

Dated: November 9, 2023

OF COUNSEL:

Michael A. Jacobs
Joyce Liou
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105
(415) 268-7000
mjacobs@mofo.com
jliou@mofo.com

Erik J. Olson
MORRISON & FOERSTER LLP
755 Page Mill Road
Palo Alto, CA 94304
(650) 813-5600
ejolson@mofo.com

Scott F. Llewellyn
MORRISON & FOERSTER LLP
4200 Republic Plaza
370 Seventeenth Street
Denver, CO 80202
(303) 592-2204
sllewellyn@mofo.com

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

/s/ Robert M. Vrana

Anne Shea Gaza (No. 4093)
Robert M. Vrana (No. 5666)
Samantha G. Wilson (No. 5816)
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
agaza@ycst.com
rvrana@ycst.com
swilson@ycst.com
Attorneys for Plaintiff Arm Ltd.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 9, 2023, a copy of the foregoing document was served on the counsel listed below in the manner indicated:

BY EMAIL

Jack B. Blumenfeld
Jennifer Ying
MORRIS, NICHOLS, ARSHT
& TUNNELL LLP
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
jblumenfeld@morrisnichols.com
jying@morrisnichols.com

Isaac B. Zaur
Nora Niedzielski-Eichner
CLARICK GUERON REISBAUM LLP
220 Fifth Avenue, 14th Floor
New York, NY 10001
izaur@cgr-law.com
nniedzie@cgr-law.com

Catherine Nyarady
Anna R. Gressel
Madalyn G. Vaughn
Jacob A. Braly
PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019
cnyarady@paulweiss.com
agressel@paulweiss.com
mvaughn@paulweiss.com
jbraly@paulweiss.com

Karen L. Dunn
William A. Isaacson
Melissa F. Zappala
Erin J. Morgan
Brian Shiue
PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP
2001 K Street, NW
Washington, DC 20006
kdunn@paulweiss.com
wisaacson@paulweiss.com
mzappala@paulweiss.com
ejmorgan@paulweiss.com
bshiue@paulweiss.com

Andrea L. D'Ambra
Susana Medeiros
Kira Latham
NORTON ROSE FULBRIGHT US LLP
1301 Avenue of the Americas
New York, NY 10019
andrea.dambra@nortonrosefulbright.com
susana.medeiros@nortonrosefulbright.com
kira.latham@nortonrosefulbright.com

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

/s/ Robert M. Vrana

Anne Shea Gaza (No. 4093)
Robert M. Vrana (No. 5666)
Samantha G. Wilson (No. 5816)
Rodney Square

1000 North King Street
Wilmington, DE 19801
(302) 571-6600
agaza@ycst.com
rvrana@ycst.com
swilson@ycst.com

Attorneys for Plaintiff Arm Ltd.